INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

October 28, 2003

TO: Interested Parties / Applicant

RE: New Castle Wallcovering / 065-17146-00016

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
e make Indiana a cleaner, healthier place to live.

Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

(317) 232-8603
(800) 451-6027
www.state.in.us/idem

MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

New Castle Wallcovering, LLC
2600 Troy Avenue
New Castle, Indiana 47362

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 065-17146-00016	
Issued by: **Original signed by** Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: **October 28, 2003** Expiration Date: **October 28, 2008**

TABLE OF CONTENTS

TABLE OF CONTENTS (Continued)

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 and A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary vinyl wall covering manufacturing plant.

Authorized Individual:	General Manager
Source Address:	2600 Troy Avenue, New Castle, Indiana 47362
Mailing Address:	4700 Robards Lane, Louisville, Kentucky 40232
General Source Phone:	(812) 949-3300
SIC Code:	3081
County Location:	Henry
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source, under PSD or Emission Offset Rules; Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

(a) Vinyl compounding operation consisting of:

(1) Two (2) silos storing PVC resins, each with a maximum throughput rate of 1,660 pounds per hour and controlled by a two (2) bin vents.

(2) Two (2) weigh/transfer units, each with a maximum throughput rate of 2,600 pounds per hour.

(3) Two (2) Littleford mixers, each with a maximum mixing capacity of 3,500 pounds per hour.

The two weigh/transfer units and two (2) Littleford mixers are controlled by one (1) baghouse.

(b) Vinyl calendering and laminating operation consisting of,

(1) Two (2) calenders/embossers, each with a maximum process rate of 1,600 pounds per hour and a maximum plasticizer addition of twenty (20) percent.

(2) One (1) laminator/embosser, with a maximum process rate of 1,600 pounds per hour and a maximum plasticizer addition of twenty (20) percent.

(c) Vinyl printing operation consisting of three (3) rotogravure printing presses (identified as press 32, 33 and 34), each with a maximum line speed of 120 feet per minute, and exhausting at stacks ID 32, 33 and 34. These units were constructed in 1988, 1990, and 1992.

(d) Six (6) drying ovens, one (1) furnace, two(2) radiant heaters, and six (6) space heaters, with a combined heat input capacity of six (6) MMBtu per hour.

SECTION B GENERAL CONDITIONS

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

B.1 Permit No Defense [IC 13]

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.5 Modification to Permit [326 IAC 2]

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management

100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)][IC 13-14-2-2] [IC13-30-3-1]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)] :

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an “authorized individual” as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and Renovation
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements

C.7 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements

C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

C.10 Monitoring Methods [326 IAC 3][40 CFR 60][40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.11 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

(a) Whenever a condition in this permit requires the measurement of total static pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(b) Whenever a condition in this permit requires the measurement of a temperature or flow rate, the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent (±2%) of full scale reading.

(c) The Preventive Maintenance Plan for the pH meter shall include calibration using known standards. The frequency of calibration shall be adjusted such that the typical error found at calibration is less than one pH point.

(d) The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.

C.12 Compliance Response Plan - Preparation and Implementation

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. If a Permittee is required to have an Operation, Maintenance and Monitoring (OMM) Plan under 40 CFR 60/63 , such plans shall be deemed to satisfy the requirements for a CRP for those compliance monitoring conditions. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan, the Permittee shall amend its Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan to include such response steps taken.

The OMM Plan shall be submitted within the time frames specified by the applicable 40 CFR60/63 requirement.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive

to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within “normal” parameters and no response steps are required.

(d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Record Keeping and Reporting Requirements

C.13 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and

expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.14 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.15 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, any reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description:

(a) Vinyl compounding operation consisting of:

(1) Two (2) silos storing PVC resins, each with a maximum throughput rate of 1,660 pounds per hour and controlled by a two (2) bin vents.

(2) Two (2) weigh/transfer units, each with a maximum throughput rate of 2,600 pounds per hour.

(3) Two (2) Littleford mixers, each with a maximum mixing capacity of 3,500 pounds per hour.

The two weigh/transfer units and two (2) Littleford mixers are controlled by one (1) baghouse.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-6.1-5(1)]

D.1.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from the two (2) PVC resin storage silos, two (2) weigh/transfer units, and two (2) mixers shall not exceed the particulate emission limit as shown in the table below.

Emission Units	Process Weight (lbs/hour)	Process Weight (tons/hour)	Particulate Emission Limit (lbs/hour)
Each of 2 PVC Resin Silos	1,660	0.83	3.62
Each of 2 Weigh/Transfer Units	2,600	1.30	4.89
Each of 2 Littleford Mixers	3,500	1.75	5.97

The pound per hour limits were calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.1.2 Particulate Control

In order to comply with D.1.1, the two (2) bin vents and one (1) baghouse for particulate control shall be in operation and control emissions from the two (2) PVC resin storage silos, two (2) weigh/transfer units, and two (2) Littleford mixers at all times that the two (2) PVC resin storage silos, two (2) weigh/transfer units, and two (2) Littleford mixers are in operation.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description:

(b) Vinyl calendering and laminating operation consisting of,

(1) Two (2) calenders/embossers, each with a maximum process rate of 1,600 pounds per hour and a maximum plasticizer addition of twenty (20) percent.

(2) One (1) laminator/embosser, with a maximum process rate of 1,600 pounds per hour and a maximum plasticizer addition of twenty (20) percent.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.2.1 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from each of the two (2) calenders/embossors, and one (1) laminator/embosser shall not exceed 3.53 pounds per hour when operating at a process weight rate of 0.80 tons per hour.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description:

(c) Vinyl printing operation consisting of three (3) rotogravure printing presses (identified as press 32, 33 and 34), each with a maximum line speed of 120 feet per minute, and exhausting at stack ID 32, 33 and 34. These units were constructed in 1988, 1990, and 1992.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.3.1 General Provisions Relating to NSPS [326 IAC 12-1][40 CFR Part 60, Subpart A]

The provisions of 40 CFR Part 60, Subpart A - General Provisions, which are incorporated by reference in 326 IAC 12-1, apply to the vinyl printing operation as described in this section except when otherwise specified in 40 CFR Part 60, Subpart FFF.

D.3.2 VOC [326 IAC 12-1][40 CFR Part 60, Subpart FFF]

Pursuant to 40 CFR 60.582(a)(1), the Permittee shall use inks with a weighted average VOC content less than one (1) kilogram VOC per kilogram ink solids at each affected facility.

D.3.3 Volatile Organic Compounds (VOCs) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11 (Fabric and Vinyl Coating), the volatile organic compound (VOC) content of the coating from each rotogravure press shall be limited to 4.8 pounds of VOC per gallon of coating, excluding water, delivered to the coating applicator.

D.3.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.3.2 and D.3.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the “as supplied” and “as applied” VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.3.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.3.6 Record Keeping Requirements

(a) To document compliance with Condition D.3.2 and D.3.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and the VOC emission limits established in Condition D.3.2 and D.3.3.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent used less water on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.3.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description:

(d) Six (6) drying ovens, one (1) furnace, two (2) radiant heaters, and six (6) space heaters, with a combined heat input capacity of six (6) MMBtu per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

There are no specifically applicable regulations that apply to these emission units.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**New Castle Wallcovering, LLC**
Address:	**2600 Troy Avenue**
City:	**New Castle, Indiana 47362**
Phone #:	**(812) 949-3300**
MSOP #:	**065-17146-00016**

I hereby certify that New Castle Wallcovering, LLC is
- **9** still in operation.
- **9** no longer in operation.

I hereby certify that New Castle Wallcovering, LLC is
- **9** in compliance with the requirements of MSOP 065-17146-00016
- **9** not in compliance with the requirements of MSOP 065-17146-00016

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION:_____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____
_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____
_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_____

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	New Castle Wallcovering, LLC
Source Location:	2600 Troy Avenue, New Castle, Indiana 47362
County:	Henry
SIC Code:	3081
Operation Permit No.:	065-17146-00016
Permit Reviewer:	ERG/SD

The Office of Air Quality (OAQ) has reviewed an application from New Castle Wallcovering, LLC relating to the operation of a vinyl wall covering manufacturing plant.

History

New Castle Wallcovering, LLC, located at 2600 Troy Avenue, New Castle, Indiana, previously operated under the name of Imperial Home Decor Group (IHDG) and changed ownership. The new owner is Laminating Services, Inc. d/b/a LSI Wallcovering, which took ownership of the plant on December 16, 2002.

Unpermitted Emission Units and Pollution Control Equipment

(a) Vinyl compounding operation consisting of:

(1) Two (2) silos storing PVC resins, each with a maximum throughput rate of 1,660 pounds per hour and controlled by a two (2) bin vents.

(2) Two (2) weigh/transfer units, each with a maximum throughput rate of 2,600 pounds per hour.

(3) Two (2) Littleford mixers, each with a maximum mixing capacity of 3,500 pounds per hour.

The two weigh/transfer units and two (2) Littleford mixers are controlled by one (1) baghouse.

(b) Vinyl calendering and laminating operation consisting of,

(1) Two (2) calenders/embossers, each with a maximum process rate of 1,600 pounds per hour and a maximum plasticizer addition of twenty (20) percent.

(2) One (1) laminator/embosser, with a maximum process rate of 1,600 pounds per hour and a maximum plasticizer addition of twenty (20) percent.

(c) Vinyl printing operation consisting of three (3) rotogravure printing presses (identified as press 32, 33 and 34), each with a maximum line speed of 120 feet per minute, and exhausting at stacks ID 32, 33 and 34. These units were constructed in 1988, 1990, and 1992.

(d) Six (6) drying ovens, one (1) furnace, two(2) radiant heaters, and six (6) space heaters, with a combined heat input capacity of six (6) MMBtu per hour.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new construction activities included in this permit.

Existing Approvals

The source has been operating under previous approvals including, but not limited to the following:

(a) PC (33) 1762, issued on July 21, 1989.

(b) OP 33-01-94-0120, issued on June 18, 1990.

(c) A065-6773-00016, issued on October 7, 1996.

(d) A065-9635-00016, issued on October 7, 1998

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

(a) IDEM is aware that equipment has been operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment*. The source failed to submit an operating permit application within the required time pursuant to 326 IAC 2-6.1 rule. Hence the source has been operating without the proper permit.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operation permit rules.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Gas discharge temp (^{0}F)	Gas flow rate (acfm)
S1	Calender 1	31	2.3	300	10,400
S2	Calender 1	33	2x2	300	10,000
S3	Laminator	33	2x2	300	10,000
S4	Calender 2	33	1.5x1.5	300	5,600
S5	Printing Presses #32 and #33 General Exhaust	28.75	2.1	200	8,700
S6		28.75	2.1	200	8,700
S7		28.75	2.1	200	8,700
S8		28.75	2.1	200	8,700
S9	Print Press #33	32	4x2.5	200	25,000

Stack ID	Operation	Height (feet)	Diameter (feet)	Gas discharge temp (^{0}F)	Gas flow rate (acfm)
S10	Print Press #33	32	1x1	200	2,500
S11	Print Press #34 (Lembo)	32	1.17	200	2,700
S12		32.7	1.5	200	4,400
S13		30.5	1.2x0.9	200	2,700
S14		28.7	4	200	31,400

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 8, 2003, with additional information received on June 9, 2003.

Emission Calculations

See Appendix A of this document for detailed emissions calculations. (Appendix A, pages 1 through 7).

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	44.8
PM10	44.8
SO_2	0.02
VOC	79.5
CO	2.21
NO_x	2.63

HAP's	Potential To Emit (tons/year)
Single HAP*	less than 10
Combination of HAPs	less than 25

* The Permittee submitted information in terms of weight % of total HAP. No information was available for individual HAPs, however, total HAPs are less than 10 tons per year. Therefore, any single HAP must be less than 10 tons per year.

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year, therefore, the source is not subject to the provisions of 326 IAC 2-7.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of VOC, PM, and PM10 are greater than twenty-five (25) tons per year, therefore, the source is subject to the provisions of 326 IAC 2-6.1. A MSOP will be issued.

(d) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD applicability.

County Attainment Status

The source is located in Henry County.

Pollutant	Status
PM10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Henry County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(b) Henry County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/year)
PM	7.95

PM10	7.95
SO_2	0.02
VOC	79.5
CO	2.21
NO_x	2.63

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions were based on revised potential to emit calculations as shown in Appendix A.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,

(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and

(c) any combination of HAPs is less than 25 tons/year.

This status is based on the revised potential to emit calculations (see Appendix A).

Federal Rule Applicability

(a) This source is subject to the requirements of the New Source Performance Standard (NSPS), 40 CFR 60, Subpart FFF - Standards of Performance for Flexible Vinyl and Urethane Coating and Printing (326 IAC 12) because this source uses rotogravure printing line used to print flexible vinyl products. Pursuant to 40 CFR 60.582(a)(1), the Permittee shall use inks with a weighted average VOC content less than one (1) kilogram VOC per kilogram ink solids at each affected facility.

(b) This source is not subject to the requirements of the New Source Performance Standard (NSPS), 40 CFR 60, Subpart QQ - Standards of Performance for the Graphic Arts Industry - Publication Rotogravure Printing (326 IAC 12) because this source does not use the rotogravure presses for publication. It uses them for vinyl wall coverings.

(c) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(c) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart KK - National Emission Standards for the Printing and Publishing Industry (326 IAC 14), because this source is not a major source of hazardous air pollutants (HAPs) as defined in 40 CFR 63.2.

(d) This source is not subject to the requirements of National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart U : Group I Polymers and Resins (326 IAC 14) because this source is not a major source of hazardous air pollutants and does not manufacture Group I polymers and resins.

(e) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 40 CFR 63, Subpart JJJJ - National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (326 IAC 14), because this source is not a major source of hazardous air pollutants (HAPs) as defined in 40 CFR 63.2.

There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP) (326 IAC 14 and 40 CFR 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

New Castle Wallcovering, LLC, formerly known as Imperial Home Decor Group, was built in 1988 and is not in one (1) of the twenty-eight (28) listed source categories. The source was modified in 1990 and 1992 to add two (2) rotogravure printing presses (identified as press 33 and press 34). After each of these modifications, the potential to emit of each criteria pollutant from the entire source remained less than 250 tons per year. Therefore, the source is a minor source under PSD and is not subject to the requirements of 326 IAC 2-2.

326 IAC 2-6 (Emission Reporting)

This source is located in Henry County and the potential to emit of PM10, VOC, CO, NO_x, and SO_2 are less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

New Castle Wallcovering, LLC was constructed prior to July 27, 1997 and the operation of vinyl wall covering manufacturing plant will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability - Printing Presses

326 IAC 8-1-6 (New Facilities - General Reduction Requirement)

Although constructed after January 1, 1980, the three (3) printing presses (identified as Press 32, 33 and 34) are not subject to the provisions of 326 IAC 8-1-6 because they are subject to the provisions of 326 IAC 8-2-11 (Fabric and Vinyl Coating).

326 IAC 8 -2-11(Fabric and Vinyl Coating)

This source is subject to 326 IAC 8-2-11 (Fabric and Vinyl Coating) because the three (3) presses (identified as press 32, 33 and 34) print on vinyl sheets. Pursuant to this rule, the owner or operator of the three (3) printing presses must limit the VOC content of the coating to 4.8 pounds of VOC per gallon of coating excluding water, delivered to the coating applicator from each vinyl coating line.

State Rule Applicability - Two (2) Calender/Embossers, One (1) Laminator/Embosser

326 IAC 8-1-6 (New Facilities ; General Reduction Requirements)

The operation of the two (2) calenders/embossers and one (1) laminator/embosser do not have potential VOC emissions equal to or greater than twenty-five (25) tons per year. Therefore, these emission units are not subject to the requirements of 326 IAC 8-1-6.

326 IAC 6-3-2 (Particulate Emission Limitations from Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from each of the two (2) calenders/embossers, and one (1) laminator/embosser shall not exceed 3.53 pounds per hour when operating at a process weight rate of 0.8 tons per hour.

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Based on potential to emit calculations as shown in Appendix A (page 6 of 7), the particulate emissions from the two (2) calender/embossers and one (1) laminator/embosser are 1.02 and 0.51 pounds per hour uncontrolled, respectively. Therefore, the source will be in compliance with this rule.

State Rule Applicability - Vinyl Compounding Operation

326 IAC 6-3-2 (Particulate Emission Limitations from Manufacturing Processes)

Pursuant to 326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes), the particulate emissions from two (2) PVC resin storage silos, two (2) weigh/transfer units and two (2) Littleford mixers shall not exceed the particulate emission limit as shown in the table below.

Emission Units	Process Weight (lbs/hour)	Process Weight (tons/hour)	Particulate Emission Limit (lbs/hour)
Each of 2 PVC Resin Silos	1,660	0.83	3.62
Each of 2 Weigh/Transfer Units	2,600	1.30	4.89
Each of 2 Littleford Mixers	3,500	1.75	5.97

The pounds per hour limitation was calculated using the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The two (2) bin vents and one (1) baghouse shall be in operation at all times the two (2) PVC resion silos and weigh/transfer units and two (2) Littleford mixers are in operation, in order to comply with these limits.

State Rule Applicability - Furnaces, Dryers, and Radient Heaters

There are no specifically applicable regulations that apply to these emission units.

Conclusion

The operation of this vinyl wall covering manufacturing plant shall be subject to the conditions of the attached Minor Source Operating Permit 065-17146-00016.

October 28, 2003
Indiana Department of Environmental Management
Office of Air Quality

Addendum to the
Technical Support Document (TSD)
for a Minor Source Operating Permit

Source Name:	New Castle Wallcovering, LLC
Source Location:	2600 Troy Avenue, New Castle, Indiana 47362
County:	Henry
SIC Code:	3081
Operation Permit No.:	065-17146-00016
Permit Reviewer:	ERG/SD

On September 16, 2003, the Office of Air Quality (OAQ) had a notice published in the Courier Times, New Castle, Indiana, stating that New Castle Wallcovering, LLC had applied for a Minor Source Operating Permit (MSOP) to operate a vinyl wall covering manufacturing plant with control. The notice also stated that the OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. Condition B.7(b) was revised to clarify that required record keeping needs to be implemented as well as the rest of the plan to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit. Also, B.7(c) has been revised to clarify that OAQ may require the Permittee to revise its PMPs whenever lack of proper maintenance is the primary contributor to an exceedance of any limitation on emissions or potential to emit.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) . . .

(b) The Permittee shall implement the PMPs, **including any required record keeping**, as necessary to ensure that failure to implement a PMP does not cause or contribute to ~~a violation~~ **an exceedance** of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or ~~contributes to any violation~~ **is the primary contributor to an exceedance of any**

limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

2. The notification requirement in C.12(b)(3) has been modified to apply only to situations where the emissions unit will continue to operate for an extended time while the compliance monitoring parameter is out of range. This provides the OAQ an opportunity to assess the situation and determine whether any additional actions are necessary to demonstrate compliance with applicable requirements.

C.12 Compliance Response Plan - Preparation and Implementation

.....

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan or Operation, Maintenance and Monitoring (OMM) Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, **and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify** the IDEM, OAQ ~~shall be promptly notified~~ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

.....

Natural Gas Combustion Only

Six (6) Drying Ovens, One (

Company Name:
Address:
MSOP: 065-17146
Plt ID: 065-00016
Reviewer: ERG/SD
Date: June 16, 2003

Heat Input Capacity MMBtu/hour		Potential Throughput MMCF/year
6.0	(15 Units Total)	52.7

Pollutant

	PM*	PM10 *	SO_2	NO_x	VOC	CO
Emission Factor (lb/MMCF)	7.6	7.6	0.6	100.0 **see below	5.5	84.0
Potential To Emit (tons/year)	0.20	0.20	0.02	2.63	0.14	2.21

* PM and PM10 emission factors are filterable and condensible PM and PM_{10} combined.

**Emission Factors for NO_x: Uncontrolled = 100, Low NO_x Burner = 50, Low NO_x

All Emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas
Emission Factors from AP-42, Chapter 1.4, Tables 1.4-1, 1.4-2, and 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (July, 1998).

METHODOLOGY

Potential Throughput (MMCF/year) = Heat Input Capacity (MMBtu/hr) * 8760 hours/year * 1 MMCF/1000 MMBtu
Potential To Emit (tons/year) = Potential Throughput (MMCF/year) * Emission Factor (lb/MMCF) * 1 ton//2000 lbs

See next page for HAPs emissions calculations.

Natural Gas Combustion Only

Six (6) Drying Ovens, One (

Company Name:
Address:
MSOP: 065-17146
Plt ID: 065-00016
Reviewer: ERG/SD
Date: June 16, 2003

HAPs - Organics

	Benzene	Dichlorobenzene	Formaldehyde	Hexane	Toluene
Emission Factor (lb/MMCF)	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential To Emit (tons/year)	5.53E-05	3.16E-05	1.98E-03	4.74E-02	8.95E-05

HAPs - Metals

	Lead	Cadmuim	Chromium	Manganese	Nickel
Emission Factor (lb/MMCF)	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential To Emit (tons/year)	1.32E-05	2.90E-05	3.69E-05	1.00E-05	5.53E-05

Methodology is the same as previous page.

The five highest organic and metal HAPs emission factors provided above are from AP-42, Chapter 1.4, Table 1-4.2, 1.4-3 and 1.4-4 (July, 1998). Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
VOC Emissions
From Rotogravure Printing Presses 32, 33 and 34

Company Name: New Castle Wallcovering, LLC
Address: 2600 Troy Avenue, New Castle, Indiana 47362
MSOP: 065-17146
Plt ID: 065-00016
Reviewer: ERG/SD
Date: June 16, 2003

THROUGHPUT

Press I.D.	Maximum Line Speed (feet/min)	Maximum Print Width (inches)	MMin^2/year
Press 32	120	56	42,384.38
Press 33	120	56	42,384.38
Press 34	120	56	42,384.38

INK VOCS

Ink Name Press I.D	Maxium Coverage '(lbs/MMin^2)	Weight % Volatiles*	*Flash Off %	Throughput (MMin^2/year)	PTE (tons/year)
Worst Case Tint Ink/Press 32	15	6.51%	100%	42384	20.7
Worst Case Print Ink/Press 33	15	8.17%	100%	42384	26.0
Worst Case Print Ink/Press 34	15	8.17%	100%	42384	26.0

Total VOC Emissions =	72.6	ton/year

***HEAT SET OFFSET PRINTING HAS AN ASSUMED FLASH OFF OF 80%. OTHER TYPES OF PRINTERS HAVE A FLASH OFF OF 100%.**
(Source -OAQPS Draft Guidance, "Control of Volatile Organic Compound Emisions from Offset Lithographic Printing (9/93))

METHODOLOGY
Throughput (Mmin^2/year) = Maxium line speed (feet/minute) * 12 inches/feet * Maximum print width (inches) * 60 minutes/ hour * 8760 hours/year
PTE VOC (tons/year) = Maximum Coverage lbs/MMin^2 * Weight % volatiles (weight % of water & organics - weight % of water = weight % organics) * Flash off * Throughput (Mmin^2/year) * 1 ton/ 2000 lbs

Appendix A: Emissions Calculations
HAP Emissions
From Rotogravure Printing Presses 32, 33 and 34

Company Name: New Castle Wallcovering, LLC
Address: 2600 Troy Avenue, New Castle, Indiana 47362
MSOP: 065-17146
Plt ID: 065-00016
Reviewer: ERG/SD
Date: June 16, 2003

Units	Worst Case Inks	Components	Max. Component Usage Rate (lbs/hour)	Ratio %	Max. Ink Usage Rate (lbs/hour)	Total Weight % HAP	PTE HAP (lbs/hour)	PTE HAP (tons/year)
Press 32	Tint	39C588	72.6	98.0%	71.1	1.48%	1.05	4.61
		39R661D	72.6	2.00%	1.45	0.14%	2.0E-03	0.01
Press 33	Print	39C811	72.8	90.0%	65.5	0.52%	0.34	1.49
		39R661D	72.6	10.0%	7.26	0.14%	0.01	0.04
Press 34	Pint	39C811	72.8	90.0%	65.5	0.52%	0.34	1.49
		39R661D	72.6	10.0%	7.26	0.14%	0.01	0.04

Combination of HAPs = 7.69

Methodology
Maximum Ink Usage Rate (lbs/hour) = Max. Ink Component Usage Rate (lbs/hour) * Ratio % of Component to Ink
PTE HAPs (lbs/hour) = Max. ink usage rate (lbs/hour) * Ratio % of the component used * Total HAP %
PTE HAPs (tons/year) = Max. ink usage rate (lbs/hour) * Ratio % of the component used * Total HAP % * 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Material Handling Operations

Company Name: New Castle Wallcovering, LLC
Address: 2600 Troy Avenue, New Castle, Indiana 47362
MSOP: 065-17146
Plt ID: 065-00016
Reviewer: ERG/SD
Date: June 16, 2003

					Before Control		After Control				
Unit	**Material**	*** Emission Factor (lb/ton)**	**Max. Throughput Rate (lb/hour)**	**(ton/hour)**	**PTE PM/PM10 (lb/hour)**	**(tons/year)**	**PTE PM/PM10 (tons/year)**	**Control Efficiency %**	**** Max. Antimony Oxide %**	**PTE Antimony Oxide (lbs/hour)**	**(tons/year)**
Silo 1 and 2		3.0	3320	1.66	4.98	21.8	0.22	99%	-	-	-
Weigh/Transfer to Mixer 1 and 2	PVC Resin	0.6	5200	2.6	1.56	6.8	0.34	95%	3.19%	0.05	0.22
Littleford Mixer 1 and 2		0.6	7000	3.5	2.10	9.2	0.46	95%	3.19%	0.07	0.29
						37.8	**1.02**			**0.12**	**0.51**

Note: Assume all PM emissions are equal to PM10 emissions
* Emission factors from AP-42, Chapter 11.13, Glass Fiber Manufacturing SCC 3-05-012-21, SCC 3-05-012-23 (September, 1985).
** Maximum antimony oxide % is equal to 8.3 lbs antimony oxide per 260 lbs of dry material as provided by the source.

Control = two (2) bin vent for silo 1 and 2, one (1) baghouse for Weigh/Transfer 1, 2 and Litteford Mixers 1, 2.

Methodolgy
Before Control
PTE PM/PM10 (lbs/hour) = Max. Throughput Rate (lbs/hour) * 1 ton/2000 lbs * Emission Factor (lb/ton)
PTE PM/PM10 (tons/year) = Max. Throughput Rate (ton/hour) * Emission Factor (lb/ton) * 8760 hours/year * 1ton/2000 lbs
PTE Antimony oxide (lbs/hour) = Max. Throughput Rate (ton/hour) * Emission Factor (lb/ton) * Max. Antimony Oxide %
PTE Antimony oxide (tons/year) = Max. Throughput Rate (ton/hour) * Emission Factor (lb/ton) * Max. Antimony Oxide % * 8760 hours/year * 1ton/2000 lbs

After Control
PTE PM/PM10 (tons/year) = Max. Throughput Rate (ton/hour) * Emission Factor (lb/ton) * 8760 hours/year * 1ton/2000 lbs * (1- Control Efficiency %)

Appendix A: Emissions Calculations
Calender/Embosser/Laminator

Company Name: New Castle Wallcovering, LLC
Address: 2600 Troy Avenue, New Castle, Indiana 47362
MSOP: 065-17146
Plt ID: 065-00016
Reviewer: ERG/SD
Date: June 16, 2003

Unit	Max. Throughput Rate (lbs/hour)	Max. Plasticizer Added %	Max. Plasticizer Loss %	** PTE VOC (lb/hour)	(tons/year)
Calender / Embosser 1 and 2	3200	20%	0.16%	1.02	4.49
Laminator / Embosser	1600	20%	0.16%	0.51	2.24
					6.73

* Plasticizer loss in percent is based on the result of the pilot test performed by the source in 1994.
****** VOC emissions are consisdered equivalent to PM/PM10 emissions because they have an appearance of a haze.

Methodology
PTE VOC (lb/hr) = Max. Throughput Rate (lbs/hour) * Max. Plasticizer Added % * Max. Plasticizer Loss %
PTE VOC (tons/year) = Max. Throughput Rate (lbs/hour) * Max. Plasticizer Added % * Max. Plasticizer Loss % 8760 hours/year * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Summary Emissions

Company Name: New Castle Wallcovering, LLC
Address: 2600 Troy Avenue, New Castle, Indiana 47362
MSOP: 065-17146
Plt ID: 065-00016
Reviewer: ERG/SD
Date: June 16, 2003

POTENTIAL TO EMIT BEFORE CONTROLS IN TONS PER YEAR

	PM	PM10	SO_2	NOx	VOC	CO	HAPs
Combustion Units	0.20	0.20	0.02	2.63	0.14	2.21	
Presses					72.6		7.69
Material Handling	37.8	37.8					0.51
Clander, Embosser, Laminator	6.73	6.73			6.73		
SUM	44.8	44.8	0.02	2.63	79.5	2.21	8.21

POTENTIAL TO EMIT AFTER CONTROLS IN TONS PER YEAR

	PM	PM10	SO_2	NOx	VOC	CO	HAPs
Combustion Units	0.20	0.20	0.02	2.63	0.14	2.21	
Presses					72.6		7.69
Material Handling	1.02	1.02					0.51
Clander, Embosser, Laminator	6.73	6.73			6.73		
	7.95	7.95	0.02	2.63	79.5	2.21	8.21